

Our ref: 004769-LTR-4

June 30, 2022

Ms. Stephanie Ross
United States Environmental Protection Agency, Region 5
77 West Jackson Boulevard, SR-6J
Chicago, Illinois 60604-3590

Response to USEPA for Additional Groundwater Study - South Andover Superfund Site

Dear Ms. Ross:

On behalf of the South Andover Administrative Group (SAAG), GHD Services, Inc. (GHD) provides this response to the United States Environmental Protection Agency (USEPA) request in your letter dated June 1, 2022 for a work plan. The June 1 letter requests that SAAG undertake a groundwater flow study in the shallow and deep sand aquifers which involve installing *several* monitoring wells in the northern portion of the South Andover Superfund site (Site) near Bunker Lake Boulevard. This work would be part of USEPA's ongoing, and not yet completed, assessment for private well impacts in the Red Oaks neighborhood, which is located north-west of the Site.

SAAG believes preparation of a work plan is pre-mature and should be deferred until the Minnesota Pollution Control Agency (MPCA) completes its temporary monitoring well investigation along Bunker Lake Boulevard as per Braun Intertec's letter dated March 28, 2022. In our technical call with USEPA and the MPCA on May 4, we were told that MPCA's work will be completed this summer. The results of the MPCA investigation are critical to the development of an appropriate work plan. Among the technical reasons for development of the Work Plan following the MPCA data collection efforts include incorporation of:

- Geologic and hydrogeologic information, such as the depth to groundwater, thickness, and lithology of the shallow and deep sand aquifers and the middle clay aquitard.
- Groundwater chemistry information regarding the location, concentration, and spatial distribution of volatile organic compounds (VOCs), 1,4-dioxane, and Per- and Polyfluoroalkyl substances (PFAS).

The forthcoming MPCA data would allow us to better locate monitoring wells within the two aquifers, determine how many wells should be installed in which aquifers, and where to screen the wells in each aquifer.

Access is another concern regarding well placement. The northern portion of the Site is commercially developed and contains two large man-made surface water features that were built circa 2005. These ponds likely affect shallow groundwater flow patterns, as well as shallow groundwater chemistry. Hydraulic and chemical data near these ponds are unlikely to represent historic groundwater flow patterns when the Site was operational. The MPCA data may provide insight about these surface water effects as two of their temporary well locations are proposed near a large 3-acre pond.

Because this area is fully developed, locating monitoring wells may be further impeded because well installations may likely be restricted to City right-of-ways or available public property. The MPCA data will further guide us on potential well placement. While the EPA requested monitoring wells for groundwater flow analysis only, we assume that they will eventually be sampled by USEPA, MPCA, or SAAG for VOCs, 1-4, dioxane, and PFAS, which also must be considered in well placement.

The MPCA temporary monitoring well data are critical and need to be reviewed prior to developing a meaningful and appropriate, cost-effective work plan that will yield appropriate data to guide further investigation. As such SAAG respectfully requests that the Work Plan be prepared following the review of the MPCA temporary well data.

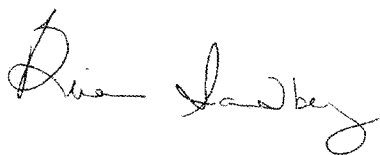
You request in your June 1 letter, that SAAG install "several" monitoring wells. SAAG's current intent is to consider installing three nested well pairs with one in the shallow sand aquifer and one in the deep sand aquifer, placed in optimal positions based on the MPCA data. The wells would be installed in a triangulated pattern to ascertain flow direction and gradient. Hydraulic data from these wells could be incorporated with the existing monitoring wells in the southwest portion of the Site to provide a site-wide groundwater flow pattern.

Therefore, SAAG respectfully requests your agreement that its work plan be deferred until the MPCA temporary well data become available.

Finally, SAAG again requests that USEPA respond to our November 23, 2021 letter concerning the recommendations presented in the Fifth Five-Year Review Report. Because milestones are approaching, SAAG wishes to get resolution on these issues to allow it to prepare its required actions.

If you have any questions, or wish to discuss further, please do not hesitate to contact either of us.

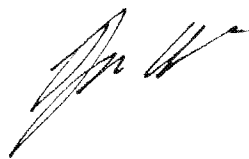
Regards,



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